

DECLARATION OF VICKI AZNARAN

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3 I, Vicki Aznaran, declare:

4 1. I was involved with the Church of Scientology
5 ("Scientology") for approximately 15, years. I submit this
6 Declaration on personal knowledge of the facts contained herein
7 and if called upon as a witness I could and would competently
8 testify thereto.

9 2. I was one of the highest ranking members of Scientology
10 and was involved in upper management. From 1978 through 1987 I
11 was a member of an organization known as the Sea Organization
12 ("Sea Org"), an elite organization within Scientology. The Sea
13 Org has considerable influence and control over other Scientology
14 organizations; it sends its officers to individual organizations
15 with unlimited power to handle ethics, tech and administration.
16 In this regard, a Sea Org member may order a non-Sea Org member on
17 virtually any subject, and the non-Sea Org member must obey. For
18 example, Sea Org "missions" are frequently sent to non-Sea Org
19 organizations when those organizations are not sending enough
20 money or public to the Sea Org organizations. These Sea Org
21 members on "mission" can take any action they deem necessary in
22 that non-Sea Org organization to accomplish their ends. They can
23 control the funds of that organization and its personnel. They
24 can remove personnel and post personnel. They can transfer funds
25 to the Sea Org organizations or spend funds as they see fit.

26 3. Generally, Sea Org members hold the management posts in
27 other organizations within Scientology. In order to be employed
28 at a middle management level or above, one must be in the Sea

1 Organization. In order to be employed at the organizations that
2 make the most money (known as the Sea Org Organizations), such as
3 the Flag Service Org in Clearwater, the Advanced Organization of
4 Los Angeles, the Advanced Organization of the U.K., the Advanced
5 Organization of Denmark and the Advanced Organization of
6 Australia, one must be a Sea Org member. Additionally, in order
7 to be employed in the organizations that control the Scientology
8 network, such as the Religious Technology Center, one must be a
9 Sea Org member. From 1984 through early 1987 I was president of
10 Religious Technology Center ("RTC"). By contrast, Scientology
11 management often designates for publicity and other reasons
12 various officers of Scientology organizations who are figure-head
13 officers only and possess little, if any, actual power over the
14 organization they purportedly serve. For example, Hebert Jentzsch
15 was at one time named the titular head of the Church of
16 Scientology International. However, during one of Mr. Jentzsch's
17 depositions he was unable to answer fundamental questions
18 concerning the management of the Church of Scientology
19 International ("CSI") and could not name the directors of CSI nor
20 the other officers. During the time I was in the Religious
21 Technology Center, from 1982 until 1987, Mr. Jentzsch had nothing
22 to do with the running of CSI. Mr. Jentzsch was a figure head and
23 public relations man. It was never intended that he would be
24 involved in the administration of CSI whatsoever. There is an
25 order from Hubbard which states that the officers of corporations
26 should be just figure heads; the directors have more power, and
27 then you have trustees who are over the very top corporations who
28 can remove directors. These trustees hold the power as regards

1 Scientology's money, assets, personnel, etc. The top trustees o
2 Scientology when I was a director of RTC were David Miscavige
3 Lyman Spurlock and Norman Starkey. Patrick Broeker and An
4 Broeker were also senior trustees over Scientology in 1982 and fo
5 some time thereafter. Miscavige convinced the Broekers to tur
6 over their trusteeships to him in order to avoid the IRS crimina
7 investigation that was ongoing. This left Miscavige, Spurlock an
8 Starkey as the trustees that could control Scientology.

9 4. Lyman Spurlock and Norman Starkey also are bot
10 high-ranking Scientologists. At times, both within and outside m
11 capacity as president of RTC, I have taken direct orders from Mr
12 Spurlock and from Mr. Starkey.

13 5. Both Mr. Spurlock and Mr. Starkey are members of the Se
14 Org. In addition, both these men hold other posts withi
15 Scientology. For example, Mr. Starkey was president of Autho
16 Services, Inc. ("ASI"), executor of the Estate of L. Ron Hubbar
17 and Trustee of the Author's Family Trust-B. Mr. Spurlock a
18 various times was the Investment Officer International for th
19 Church of Scientology, an executive of ASI, and president o
20 Church of Spiritual Technology ("CST"). Both men have serve
21 together as officers of Galaxy Productions, Inc.

22 6. Mr. Spurlock controlled virtually all tax matters fo
23 the Religious Technology Center, CSI, ASI, CSC and CST. Durin
24 the time I was an officer and director of RTC, I was asked to sig
25 letters for RTC which had been drafted by Mr. Spurlock or at hi
26 request. Mr. Spurlock dealt with the tax attorneys wh
27 represented RTC. Sometimes I would be informed of actions he ha
28 taken regarding RTC tax matters after the fact, and sometimes

1 was never informed. Mr. Spurlock met with the Internal Revenue
2 Service on more than one occasion to negotiate matters for RTC.
3 He did this entirely on his own and made his own decisions
4 regarding RTC's tax matters and tax exempt status. Mr. Spurlock
5 and Mr. Starkey frequently issues orders to me concerning
6 litigation and tax matters concerning RTC, CSI, CSC and other
7 Scientology entities. Mr. Spurlock also set up the current
8 corporate structure of Scientology. This includes the set up of
9 RTC, CSI and CST. Mr. Spurlock set up these structures and, along
10 with Miscavige and Starkey, chose the directors, trustees and
11 officers.

12 7. Mr. Starkey gave orders concerning litigation matters
13 for Scientology. In 1982 Norman Starkey and David Miscavige
14 ordered me to get Dick Story of the Guardians Office World Wide to
15 hire a private investigator named Dick Bast to compromise Judge
16 Krentzman, who was the judge on a case against Scientology in
17 Florida. Judge Krentzman had been giving Scientology unfavorable
18 rulings in the case. From 1981 up until the time I left, Starkey,
19 Spurlock and Miscavige closely supervised all litigation brought
20 either for or against the various Scientology corporations. The
21 settlement initiated by Scientology for all of the cases that
22 Michael Flynn had brought against them was ordered by Miscavige,
23 Starkey and Spurlock with no consultation with the various
24 corporations who were sued, such as Church of Scientology of
25 California. In fact, this settlement was considered top secret
26 and the officers and directors of the various corporations who
27 were supposedly settling with Mr. Flynn did not even know the
28 specifics of the settlement. The various officers of the

1 Scientology corporations know that they do not, in fact, make
2 decisions about their respective corporations. They are told and
3 understand that they sign what they are told to and that this is
4 done in order to comply with the suppressive government
5 requirements and avoid having to pay taxes to the suppressive IRS.
6 In 1982 Mr. Spurlock ordered the then-head of international
7 management, John Nelson, to buy into a gold mine in Canada using
8 several million dollars worth of church funds. Mr. Nelson
9 disagreed and said that he thought it was a bad investment. Mr.
10 Spurlock made the transaction anyway, as he controlled
11 Scientology's funds. Mr. Spurlock's position at the time was
12 Deputy Executive Director for Client Affairs at Author Services
13 Inc., a for-profit organization which had been represented to the
14 IRS as having no control whatsoever over tax exempt church funds.
15 Mr. Spurlock's gold mine venture lost a considerable sum of money
16 for Scientology. Mr. Spurlock also ordered Scientology
17 management, specifically Marc Yager and Wendell Reynolds, to buy
18 into oil wells in Oklahoma. Mr. Yager expressed to me that he had
19 reservations about this venture, but complied anyway. This
20 venture also lost quite a bit of money for Scientology.
21 Additionally, Starkey and Miscavige bought into the oil venture
22 (with their personal funds) in Oklahoma and were able to get a
23 much better deal for themselves due to putting Hubbard's and
24 Scientology money into the venture.

25 8. Additional facts indicative of the management authority
26 possessed and used by both Mr. Spurlock and Mr. Starkey over the
27 entities involved in the Scott/Wollersheim consolidated lawsuit:
28 (i.e., Church of Scientology International ("CSI"), Church of

1 Scientology of California ("CSC"), Religious Technology Cente
2 ("RTC") and Church of Spiritual Technology ("CST") include th
3 following:

4 A. Mr. Spurlock ordered that the original Scott sui
5 be brought. He was involved in all of the major strateg
6 meetings with attorneys concerning both the Scott an
7 Wollersheim cases and, in fact, began planning the sui
8 against David Mayo in 1982, shortly after Mayo opened hi
9 Church.

10 B. Mr. Starkey was also involved in all major meeting
11 with attorneys concerning the Scott/Wollersheim cases. H
12 made active decisions and ordered the attorneys as to action
13 they were or were not allowed to take in regards to thes
14 facts. In fact, Mr. Starkey and Mr. Spurlock accompanied a
15 attorney for Scientology, Mr. Earle Cooley, one night on wha
16 was described by them as an attempt to visit the residence o
17 Judge Mariana Pfaelzer after she had ruled agains
18 Scientology at a hearing. He went with Mr. Cooley in orde
19 to express their views to Judge Pfaelzer and persuade her t
20 rule favorably for Scientology. Mr. Starkey and Mr. Spurloc
21 stayed up all night that night working on drafting papers fo
22 the Scott/Wollersheim cases.

23 9. One of the reasons why Scientology elects to manage it
24 far-flung enterprises in this manner is to try to sheild it
25 management from legal process. Front men are designated to hol
26 figure-head posts, while the real management power is held b
27 others outside the corporate structure. To this end, Scientolog
28 will go to extreme lengths to conceal upper management persone

1 from service of process, subpoenas and depositions. When alive
2 L. Ron Hubbard was protected in this manner. In addition
3 personnel have been driven around the city in covered vans to
4 protect their identities and whereabouts. Moreover, when deemed
5 necessary, personnel are sent out of this country in order to
6 avoid legal process.

7 For example, in 1984 when the IRS was conducting
8 criminal investigation against various Scientology entities, the
9 personnel who had knowledge of criminal behavior as regard
10 Scientology funds were hidden or sent away. Fran Harris, who was
11 involved with Bridge Publications and Church and L. Ron Hubbard's
12 funds, was sent to Denmark for a year. Mark Ingber, WDC member
13 for Finance, was also sent to Denmark for a year. Wendel
14 Reynolds, who had similar knowledge, was put away on the RPF in
15 Happy Valley. Miscavige, Starkey and Spurlock took great
16 precautions with their travels, offices and residences so that
17 they could not be found or served. Miscavige has been known to
18 actually rent clandestine quarters away from any Scientology
19 facility, paid for with Scientology funds, simply so that he could
20 hide out from process servers.

21 10. Both Mr. Spurlock and Mr. Starkey have been afforded
22 this "protection" by Scientology. It is doubtful that either will
23 be deposed if personal service of a subpoena upon them is deemed
24 necessary prerequisite. Scientology will take all measures
25 necessary to keep these men cloistered from view and immunize
26 from service.

27 11. On the other hand, it is clear that when Scientology
28 wants help from Mr. Spurlock and Mr. Starkey both men stand ready

1 to assist. Accordingly, whenever declarations are needed by
2 Scientology in any of their lawsuits or other legal proceedings,
3 Scientology has no difficulty in obtaining the assistance of both
4 Mr. Starkey and Mr. Spurlock. In this regard, Miscavige took office
5 for over two months and lived in Portland, Oregon in order to
6 oversee and direct the attorneys for Scientology on a daily basis
7 during the entire trial in the case of Julie Christoffersen
8 Titchbourne, which she had brought against Scientology. Mr.
9 Spurlock also spent most of his days in Portland during the
10 trial. During the Wollersheim trial, Miscavige, Starkey and
11 Spurlock supervised the attorneys representing CSC on a daily
12 basis throughout the nearly three-month trial in Los Angeles.
13 Miscavige, Starkey and Spurlock stay briefed on a daily basis on
14 all legal matters of any consequence involving any Scientology
15 entity. All papers filed by the Scientology entities involved in
16 the consolidated Scott/Wollersheim cases had to be sent via
17 Spurlock and Miscavige for authorization before they could be
18 filed.

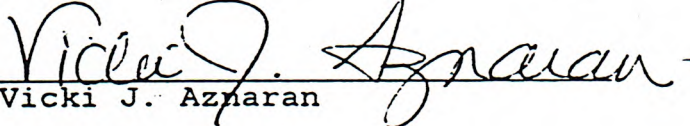
19 12. In addition, without revealing any privileged
20 communications, I am able to state that both Mr. Spurlock and Mr.
21 Starkey have been involved directly in the management of CSI, CSC,
22 RTC and CST, and have participated in meetings in which decisions
23 affecting these consolidated Scott/Wollersheim cases have been
24 made. We have worked together in the past and I know that no
25 major decision affecting these entities or these cases are made
26 without their knowledge, participation and/or consent. Based upon
27 all the information personally available to me, I am of the
28

1 opinion that both Mr. Starkey and Mr. Spurlock are managing agents
2 of CSI, CSC, RTC and CST.

3 13. I have reason to believe that documents which would
4 normally reflect traditional criteria of the managing agent
5 relationship between Scientology and Messrs. Spurlock and Starkey
6 have been either destroyed or concealed by Scientology. For
7 example, at Mr. Starkey's direction, I destroyed such information
8 as it related to the involvement and control over Scientology by
9 L. Ron Hubbard, Mr. Starkey and Mr. David Miscavige.

10 I declare under penalty of perjury under the laws of the
11 United States that the foregoing is true and correct.

12 Executed this 27th day of October 1988, in Dallas, Texas.

13
14 
15 Vicki J. Aznar